## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

JUANA VILLEGAS,		
Plaintiff,	)	
v.	)	No. 3:09-0219
THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY,	)	Judge Haynes
Defendant.	)	

## METROPOLITAN GOVERNMENT'S PROPOSED VERDICT FORM

The Metropolitan Government of Nashville and Davidson County files the attached proposed verdict form for purposes of the hearing on damages, set to begin August 16, 2011.

THE DEPARTMENT OF LAW OF THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY Sue B. Cain, #9380, Director of Law

/s/ Allison L. Bussell
Kevin C. Klein, #22301
Allison L. Bussell, #23538
Assistant Metropolitan Attorneys
P.O. Box 196300
Nashville, Tennessee 37219
(615) 862-6341

## **Certificate Of Service**

I hereby certify that a copy of the foregoing has been served electronically on William L. Harbison, Phillip F. Cramer, and John L. Farringer, IV, 424 Church Street, Suite 2000, Nashville, Tennessee 37219; and Elliott Ozment, 1214 Murfreesboro Pike, Nashville, Tennessee, 37217; on this 9<sup>th</sup> day of August, 2011.

/s/ Allison L. Bussell
Allison L. Bussell

## **VERDICT FORM**

1.	Do you find that plaintiff Ju-	ana Villegas has established by a preponderance of
the evidence	that she is entitled to an award	of compensatory damages against the Metropolitan
Government	of Nashville and Davidson Cou	nty?
	YES	NO
If you	answered "YES" to question	1, proceed to question 2. If you answered "NO" to
question 1, sl	kip to question 3 and award plai	ntiff one dollar (\$1.00) in nominal damages.
2.	What amount of compensate	ory damages is plaintiff Juana Villegas entitled to
against the M	Metropolitan Government of Nas	shville and Davidson County?
	\$	
If you	awarded compensatory damag	es, skip question 3 and have the foreperson sign and
date this form	n.	
3. the Metropol	What amount of nominal dan itan Government of Nashville a	mages is plaintiff Juana Villegas entitled to against nd Davidson County?
		FOREPERSON
		DATE
		TIME